

EXHIBIT 50

In the Matter Of:

ALICIA HERNANDEZ vs WELLS FARGO

3:18-cv-07354-WHA

ALICIA HERNANDEZ

June 10, 2019



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1 mortgage payments, right?

2 A Yes.

3 Q You didn't do that, correct?

4 A Correct.

5 Q And as a result, they foreclosed on the
6 mortgage, right?

7 A They did foreclose.

8 Q Ms. Hernandez, I want to talk about some
9 foundational things. We're wrapping up.

10 What do you think this lawsuit is about?

11 MS. LAM: I object to form.

12 THE WITNESS: I believe this lawsuit is
13 about myself and others that were wrongfully denied
14 a loan modification from Wells Fargo.

15 BY MS. BRINSON:

16 Q What type of loan modification is it that
17 you think you were denied wrongfully?

18 MS. LAM: I object to form.

19 THE WITNESS: The opportunity to just
20 have -- have the opportunity to have some sort of
21 reprieve so that I could save my property if I was
22 eligible.

23 BY MS. BRINSON:

24 Q Do you know which loan modification is at
25 issue in this lawsuit?

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1 Q So now that you are here, what are you
2 seeking from Wells Fargo?

3 MS. LAM: I object to form.

4 THE WITNESS: I'm looking for justice for
5 myself and for everyone else that received those
6 letters and were denied loan modifications when they
7 could have received them.

8 BY MS. BRINSON:

9 Q Ms. Hernandez, you understand that you
10 weren't denied a loan modification, correct?

11 MS. LAM: I object to form.

12 THE WITNESS: I'm just going by what I was
13 told by Wells Fargo and -- on the phone and in the
14 letter.

15 BY MS. BRINSON:

16 Q Do you understand the difference between a
17 trial payment plan and a permanent loan
18 modification?

19 A Somewhat, but -- sorry. Go ahead.

20 Q What amount of money would the
21 modification -- what amount could you have afforded
22 to make the modification work?

23 MS. LAM: I object to form.

24 THE WITNESS: I can't answer that
25 specifically at this point in time.

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1 A I believe if the -- if the lawsuit is
2 successful, then they will be compensated.

3 Q Under what terms?

4 A Can you -- what do you mean by "what
5 terms"?

6 Q Is there a certain percentage?

7 A To my knowledge, it's 33 percent.

8 Q Do you have a separate arrangement with
9 the Paul law firm?

10 A I don't believe so.

11 Q Are you familiar with the Paul law firm?

12 A Yes. I have seen their name on the
13 documents.

14 Q What is your arrangement with them?

15 A From my understanding, they are cocounsel.

16 Q And what is your role in this case?

17 MS. LAM: I object to form.

18 THE WITNESS: I believe my role is as
19 class representative.

20 BY MS. BRINSON:

21 Q And what does that mean to you?

22 A That means I'm supposed to communicate
23 efficiently with the lawyers, provide any and all
24 documentation that I have, and to represent myself
25 and the others in this, this matter.

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1 Q Do you know any of the other plaintiffs
2 personally?

3 A No, I don't.

4 Q Do you know anybody -- do you have a
5 relationship with anybody at either the Gibbs or
6 Paul law firms?

7 A No.

8 Q Do you have any agreements with any other
9 attorneys other than the Gibbs and Paul firms?

10 A No.

11 Q Is your relationship with the foreclosure
12 counsel for Unit 19 still ongoing?

13 A No.

14 Q All right. So in terms of documents --
15 and this is the very last thing I'm going to ask you
16 about -- did you look through -- well, just walk me
17 through your document -- where did you look for
18 documents? How did you find the documents that are
19 in your possession?

20 A Well, I kept a hard copy of everything
21 that I had through the Wells Fargo proceedings, so I
22 had a hard copy of everything, and that's what I
23 sent to my attorneys. I also searched emails to see
24 if there had been anything electronically, and
25 anything that I could find I sent over.

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REPORTER'S CERTIFICATION

I, Mona M. Russo, Certified Shorthand
Reporter in and for the State of California, do
hereby certify:

That the foregoing witness was by me duly
sworn; that the deposition was then taken before me
at the time and place herein set forth; that the
testimony and proceedings were reported
stenographically by me and later transcribed into
typewriting under my direction; that the foregoing
is a true record of the testimony and proceedings
taken at that time.

IN WITNESS WHEREOF, I have subscribed my
name this 24th day of June, 2019.

Mona M. Russo

MONA M. RUSSO, CSR NO. 8771